



GEORGETOWN UNIVERSITY LAW CENTER
INSTITUTE FOR PUBLIC REPRESENTATION

Hope M. Babcock
Angela J. Campbell
David C. Vladeck
Directors
Eric D. Albert
Karen Henein+*
Richard McKewen
Jennifer L. Prime+**
Kristi M. Smith
Staff Attorneys

600 New Jersey Avenue, NW, Suite 312
Washington, DC 20001-2075
Telephone: 202-662-9535
TDD: 202-662-9538
Fax: 202-662-9634

March 23, 2005

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**RE: Standardized and Enhanced Disclosure Requirements for Television Broadcast
License Public Interest Obligations, MM Docket No. 00-168;
Second Periodic Review of the Commission's Rules and Policies Affecting the
Conversion To Digital Television, MB Docket No. 03-15.**

Dear Ms. Dortch:

Pursuant to section 1.1206 (b)(2) of the Commission's rules, we hereby submit this notice regarding an *ex parte* meeting in the above-referenced proceedings.

On Tuesday, March 22, 2005, representatives of the Public Interest, Public Airwaves Coalition met with staff members of the FCC's Media Bureau. Attending the meeting were Deborah Klein, Rick Chessen, and William Johnson of the Media Bureau; Gloria Tristani, of the Office of Communication of the United Church of Christ, Inc.; Meredith McGehee, of the Alliance for Better Campaigns; Karen Menichelli, of the Benton Foundation; James Benton, of Common Cause; and Karen Henein, of the Institute for Public Representation at Georgetown University Law Center.

The group discussed the attached proposed public interest television disclosure form and processing guidelines with the Media Bureau. Members of Public Interest, Public Airwaves Coalition noted that the current issues/programs lists do not provide an effective means for the public to assess licensees' performance. Because the requirement of listing programs is so vague, these lists lack uniformity and consistency and make it difficult to discern the amount and type of public interest programming a broadcaster carries.

The group noted that its disclosure form proposal, based on comments filed by UCC, *et al.* in 2000, is standardized and gathers information the public needs to meaningfully evaluate whether licensees are serving their public interest obligations. The form also helps the public determine how broadcasters are using their new digital spectrum.

As detailed in the attached memoranda, the group also explained that its proposed disclosure form and proposed public interest obligations processing guidelines are clearly constitutional.

In addition to these discussions, members presented a copy of the Benton Foundation's recent publication, *Citizen's Guide to the Public Interest Obligations of Digital Television*, filed electronically in MM Docket No. 99-360 on March 9, 2005.

In accordance with the Commission's rules, this *ex parte* notice is being filed electronically in the above referenced dockets. If you have any questions regarding this filing, please do not hesitate to contact me at (202) 662-9545.

Respectfully Submitted,

/s/

Karen Henein

Attachments